FILED IN OPEN COURT

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IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF VIRGINIA

WESTERN DISTRICT OF VIRGINIA DANVILLE DIVISION

UNITED STATES OF AMERICA)	
v.)	Criminal No.: 4:18-cr-00011
SHANICQUA LATRICE COLEMAN)	
(a/k/a "Egg")	•)	

STATEMENT OF FACTS

The parties stipulate that the allegations contained in the First Superseding Indictment and the following facts are true and correct. Defendant SHANICQUA LATRICE COLEMAN acknowledges that had this matter gone to trial, the United States would have proven each of these facts beyond a reasonable doubt.

In the summer of 2016, Tenikqua Fuller ("Fuller") and SHANICQUA LATRICE COLEMAN ("COLEMAN") lived at the Southwyck Apartments, in an apartment on the first floor of building no. 115, which was the last apartment building on the left on North Hills Court. Southwyck Apartments is located in Danville, Virginia, which in turn is located in the Western District of Virginia.

On June 15, 2016, COLEMAN was not present for and did not see a shooting at approximately 10:30 p.m. outside of building no. 111 at Southwyck Apartments. No one was in her apartment before, during, or after the shooting.

On August 20, 2016, COLEMAN was present at Southwyck Apartments. For part of the day, she was present at Ashley Ross's apartment, which was located on the third floor of building no. 111. At other times, COLEMAN hung out in her apartment with her young son. At different times, individuals came in and out of the apartments, including Phillip Miles (a/k/a "R"), Kevin Trent, Jr. (a/k/a "Bad Ass" or "Gates"), Dashaun Trent (a/k/a "Six" or "DaDa"), Kanas Trent (a/k/a "LA"), Shabba Chandler (a/k/a "Trill"), and Laquante Adams (a/k/a "Spazz"). At some point, someone discussed that there may be a shooting that night. A little after 9 p.m., Fuller returned from her work at Wal-Mart.

At approximately 10:30 p.m. that night, COLEMAN and Fuller were in their apartment when gunfire from multiple firearms occurred outside of her apartment. COLEMAN was asleep in her room with the fan on and did not hear the gunfire. COLEMAN did not see who fired shots or who was outside during the shooting. When the shooting was over, a man lay dead on

Defendant's Initials: 5C

the steps of the apartment across from her apartment building. A few minutes after the shooting ended, Miles, Kevin Trent, Jr. and Stevie Johnson (a/k/a "No Good") entered her apartment through a back bedroom window. COLEMAN later discovered that all were armed and all appeared to have just been involved in the shooting outside her apartment. Fuller helped hide their firearms. Fuller provided bleach to Miles, Kevin Trent, Jr., and Johnson so they could eliminate gun powder residue from their skin. When police knocked on the apartment door later, Fuller and COLEMAN lied to the police and stated that they had not seen or heard anything, although, at the time, Miles, Kevin Trent, Jr., and Johnson were in their apartment. By lying to the police, COLEMAN was trying to help Miles, Trent Jr., and Johnson avoid detection by law enforcement. Miles, Kevin Trent, Jr. and Johnson stayed in the apartment overnight. The three firearms used in the shooting stayed in their apartment a few more days.

On May 7, 2018, COLEMAN appeared before a federal grand jury sitting in Charlottesville, Virginia. While testifying before the grand jury, which was investigating gang violence in Danville, Virginia, COLEMAN repeatedly lied under oath regarding her knowledge of the Rollin 60s Crips, the Milla Bloods, and the murder of Christopher Motley on August 20, 2016. The testimony provided to the Grand Jury was material to the Grand Jury's investigation. COLEMAN did so in order to protect herself and also to help others avoid detection by law enforcement.

The actions taken by COLEMAN as described above were taken willfully, knowingly, and with the specific intent to violate the law. COLEMAN did not take those actions by accident, mistake, or with the belief that they did not violate the law. COLEMAN acknowledges that the purpose of the foregoing statement of facts is to provide an independent factual basis for her guilty plea. It does not necessarily identify all of the persons with whom the defendant might have engaged in illegal activity.

Respectfully submitted,

Heather L. Carlton

Ronald M. Huber

Assistant United States Attorneys

Michael J. Newman

Special Assistant United States Attorney

After consulting with my attorney and pursuant to the plea agreement entered into this day, I stipulate that the above Statement of Facts is true and accurate, and that had the matter proceeded to trial, the United States would have proved the same beyond a reasonable doubt.

SHANICQUA LATRICE COLEMAN

Defendant's Initials: SC

I am SHANICQUA LATRICE COLEMAN's attorney. I have carefully reviewed the above Statement of Facts with him. To my knowledge, his decision to stipulate to these facts is an informed and voluntary one.

Richard Derrico, Esquire Counsel for Defendant

Defendant's Initials: